

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

**ANGELETTE BLOUNT,
Plaintiff**

v.

**NATIONAL CREDIT SYSTEMS,
INC.,
Defendant**

**Civil Action No.
1:18-cv-03842-CAP-JKL**

PLAINTIFF'S MOTION FOR CLERK'S ENTRY OF DEFAULT

Comes now Plaintiff by and through her undersigned attorney and does hereby move the Court to enter a clerk's entry of default against Defendant National Credit Systems, Inc. pursuant to Fed. R. Civ. P. 55(a). Plaintiff filed her complaint on August 13, 2018. (Doc. 1). Defendant was served with a copy of the Complaint on August 20, 2018. (Doc. 3). Plaintiff's Answer was due on September 10, 2018. Fed. R. Civ. P. 12(a)(1)(A). On September 10, 2018, an employee of Defendant contacted Plaintiff's attorney via telephone and requested a ten day extension to file a response; Plaintiff's attorney agreed. Defendant did not file a motion for extension of time to file an answer with the court. Defendant did not file an answer by September 20, 2018, which is ten days later than the due date for Defendant's answer. Defendant is

a sophisticated business entity that has been a party to more than 300 civil actions in U.S. District Courts throughout the country according a PACER search conducted on September 21, 2018.

For the foregoing reasons, Plaintiff requests that the Clerk enter a Clerk's Entry of Default as to Defendant.

Respectfully submitted this 21st day of September, 2018.

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/S/Chris Armor

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CERTIFICATE OF COMPLIANCE

I hereby certify that this document was prepared in size 14 Times New Roman font.

/S/ Chris Armor